THE UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF TEXAS

HOUSTON DIVISION

PLAINTIFF,

Caitlin Weathers

Versus

CIVIL ACTION 4:22-CV-04085

DEFENDANTS,

Houston Methodist Hospital, et al.

MOTION FOR VIRTUAL HEARING AND CONFERENCES

Caitlin Weathers, Plaintiff, files this Motion for Virtual Hearing and Conferences under FRCP 43a, 45c, and 30(b)(4). Here, there is reasonably good cause as to having received a job offer on May 21, 2025, for a new position located 1,172 miles from the Southern District of Texas Court at 515 Rusk St., Houston, TX, 77002. (Exhibit A) Federal Rule of Civil Procedure 43(a) states that federal courts may permit remote testimony by virtual means when they find "good cause in compelling circumstances." Rule 45(c) limits a court's jurisdictional reach over potential witnesses or individuals living in-state or within 100 miles of the trial. Concurrently, Rule 45(c)(1) prevents a plaintiff from testifying in court

when they live too far away. Specifically, this Rule explains that "[a] subpoena may command a person to attend a trial, hearing, or deposition" only if it takes place "within 100 miles of where the person resides, is employed, or regularly transacts business in person." Here, Plaintiff, Weathers, makes a good-faith request that she not be held against her will, as this could be seen as a form of False Imprisonment.

CERTIFICATE OF SERVICE

I certify that on April 18, 2025, a true and correct copy of the Motion for Virtual Hearing and Conferences was served on counsel for Houston Methodist Hospital, et. al., by the Court's ECF filing system and email.

Daniel Patton

S.D. Tex. Admission No. 26200

Texas Bar No. 24013302

dpatton@scottpattonlaw.com

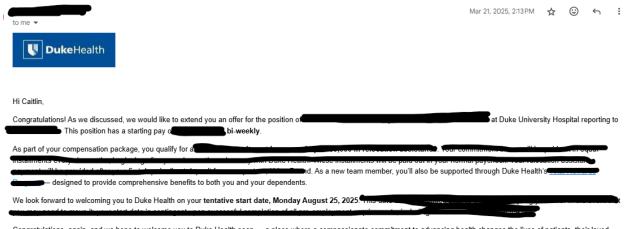
Caitlin Weathers

CERTIFICATE OF CONFERENCE

On April 17, 2025, Plaintiff Caitlin Weathers conferred in good faith via email with Mike Burke. At that time, he was unable or unwilling to provide a foundational legal basis for why they did not consider residing over 1,000 miles away a good cause to request virtual hearings and conferences.

Caitlin Weathers

EXHIBIT A



Congratulations, again, and we hope to welcome you to Duke Health soon — a place where a compassionate commitment to advancing health changes the lives of patients, their loved ones, and the greater community.

Once you have reviewed these details please let me know if you accept/decline this offer after your shadow is complete. If you need more time to consider this position, or if you have any questions please feel free to reach out to me!

Sincerely,



